

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

EMMANUEL C. GONZALEZ,	§	
	§	
Plaintiff,	§	
	§	Case No. 2:14-cv-0630
vs.	§	Consolidated Lead Case
	§	
ZULILY, INC.,	§	JURY DEMAND
	§	
Defendant.	§	

SOCIAL CONCEPTS, INC.	§	Case No. 2:14-cv-0650
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AUTOTRADER.COM, INC.	§	Case No. 2:14-cv-0651
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**JOINT MOTION TO STAY
ALL DEADLINES AND DISCOVERY PENDING TRANSFER**

Plaintiff Emmanuel C. Gonzalez and Defendants Social Concepts, Inc., and Autotrader.com, Inc. jointly move the Court for entry of an Order Staying all deadlines, including all discovery-related deadlines and obligations.

The Court recently granted Defendants' separate Motions to Transfer to the District Courts for the Northern District of Georgia [Dkt. No. 80] and Northern District of California [Dkt. No. 79], respectively. The parties expect that each transferee court will establish new docket control, discovery, and other related orders which will dictate the progression of discovery and trial in each respective case. Accordingly, in order to proceed efficiently in each transferee court, and to ease the burden on this Court, the parties respectfully request that the Court stay all pending deadlines and discovery obligations.

A Proposed Order is being submitted herewith. The parties have conferred and agree on the content of the Proposed Order.

March 26, 2015

Respectfully submitted,

/s/ M. Scott Fuller

M. Scott Fuller

Texas Bar No. 24036607

sfuller@lockelord.com

Paul D. Lein

Texas Bar No. 24070133

plein@lockelord.com

Darrian L. Campbell

Texas Bar No. 24087250

dcampbell@lockelord.com

LOCKE LORD LLP

2200 Ross Avenue, Suite 2200

Dallas, Texas 75201-6776

Telephone: (214) 740-8000

Facsimile: (214) 740-8800

ATTORNEYS FOR PLAINTIFF

EMMANUEL C. GONZALEZ

/s/ John M Guaragna w/permission

John M Guaragna

DLA Piper US LLP - Austin

401 Congress Ave

Suite 2500

Austin, TX 78701-3799

512/457-7000

Fax: 512/457-7001

Email: John.Guaragna@dlapiper.com

ATTORNEY FOR DEFENDANT

SOCIAL CONCEPTS, INC.

/s/ Alan D Albright w/ permission

Alan D Albright

Sutherland Asbill & Brennan LLP - Austin

600 Congress Avenue

Suite 2000

Austin, TX 78701

512-721-2710

Fax: 512-721-2656

Email: alan.albright@sutherland.com

ATTORNEY FOR DEFENDANT

AUTOTRADER.COM, INC.

CERTIFICATE OF SERVICE

I hereby certify that on March 26, 2015, I electronically filed the foregoing with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ M. Scott Fuller